

EXHIBIT 2

DEFICIENCIES IN INTERROGATORIES

Narrow Way Realty Ltd.

- **No. 1:** Identifies American Community Bank, but does not say there are no others. Need clarification.
- **No. 3:** Does not identify all signatories, only one (Vic); are there others?
- **No. 4:** Does not state whether he has always been the sole member, only that he is currently; has that always been the case?
- **No. 5:** Only listed one PO Box mailing address; we asked for physical and other addresses used since its formation.
- **No. 6:** Does not answer the question at all; we asked its primary business, they said it's not nursery and landscape supply.
- **No. 7-12; 14-19:** Does not answer the question at all.
- **No. 13:** Extremely vague answer, does not provide enough information.

Don Caroleo

- **No. 1-3, 5, 7, 9-11; 16:** Only objections, no response.
- **No. 4:** Only IDs entities that are Defendants; does not identify any others or say this is a full list of all entities.
- **No. 6:** Only provides one number and no other information requested, does not say there are no other phone numbers. We need the carrier information.

3670 Route 112 LLC; 9 4th St. LLC

- **No. 1:** Identifies Webster Bank, but does not say there are no others. Need clarification.
- **No. 2:** Does not answer the question at all, referred to production (but nothing currently in production).
- **No. 3:** Who are the other signatories, if any?
- **No. 4:** Does not state whether there are other shareholders/members/owners of Defendant.
- **No. 5:** Only listed one PO Box mailing address; we asked for physical and other addresses used since its formation.
- **No. 6:** "Real estate" does not tell us anything; what specifically does the company do?
- **No. 7-8:** States that Defendant is not in the nursery and/or landscape supply business and does not substantively answer the question.
- **No. 10-12:** Does not answer the question at all.
- **No. 13:** Does not answer the question at all, refers to bank production.

The Garden Dept. Corp.

- **No. 1:** Identifies Webster Bank but does not say there are no others. Need clarification.
- **No. 2:** Does not answer the question at all, referred to production (but nothing currently in production).

- **No. 3:** Who are the other signatories, if any?
- **No. 4:** Who were the previous shareholders, members and owners and are there currently additional shareholders, members or owners?
- **No. 5:** Are there any additional addresses associated with Garden Dept?
- **No. 7:** Does not answer the question and instead states that all of The Garden Dept.'s customers continued with, and their identity is in the possession of, SiteOne.
- **No. 8; 11:** Does not substantively respond to the Interrogatory.
- **No. 10; 12:** Does not answer the question at all.

Narrow Way 2 LLC

- **No. 1-3; 9-12:** Does not answer the question at all.
- **No. 4:** They identify Vic as the current sole member. Were there previously any additional shareholders, members, or owners of Narrow Way 2?
- **No. 5:** Are there additional addresses associated with Narrow Way 2?
- **No. 6:** Does not answer the question at all; we asked its primary business, Defendants said it's not nursery and landscape supply.
- **No. 7-8:** Defendant states it is not in the retail nursery and/or landscape supply business. This does not answer the question.

Neway Management

- **No. 1-3; 9-12:** Does not answer the question at all.
- **No. 4:** Identifies Vic as an owner. Who are the other shareholders, members, and owners, if any?
- **No. 5:** Are there additional addresses associated with Neway Management?
- **No. 6:** "Management company" does not tell us anything; what specifically does the company do?
- **No. 7-8:** Defendant states it is not in the retail nursery and/or landscape supply business. This does not answer the question.

Group 5 Associates Ltd.

- **No. 1-3; 9-12:** Does not answer the question at all.
- **No. 4:** Identifies Vic. Who are the other shareholders, members, and owners, if any?
- **No. 5:** Only listed one PO Box mailing address; we asked for physical and other addresses used since its formation.
- **No. 6:** Does not answer the question at all; we asked its primary business, they said it's not nursery and landscape supply.
- **No. 7-8:** Defendant states it is not in the retail nursery and/or landscape supply business. This does not answer the question.

Scapes Supply LLC

- **No. 1-3; 8-9; 11-12:** Does not answer the question at all.

- **No. 4:** Are there any other previous shareholders, members, and owners?
- **No. 5:** Are there any additional addresses associated with Defendant?
- **No. 7:** SiteOne does not have information regarding Scares Supply's customers. Defendant must produce this information.

Vic Caroleo

- **No. 1-3; 5; 7; 9-15:** Only objections, no response.
- **No. 4:** Only identifies entities that are Defendants; does not identify any others or say this is a full list of all entities.
- **No. 6:** Only provides one number and no other information requested, does not say there are no other phone numbers. We need the carrier information.
- **No. 16:** The Interrogatory requests payments received from Narrow Way Realty by Vic or any entity he owns/operates/controls. His response appears to only relate to amounts received by Vic, not about amounts received by any entity he owns/operates/controls.

Nick Giordano

- **No. 1-3; 5; 7; 9-12:** Only objections, no response.
- **No. 4:** Only states that he is not an owner of any of the named defendants.
- **No. 6:** Only provides one number and no other information requested, does not say there are no other phone numbers. We need the carrier information ASAP.
- **No. 15:** The Interrogatory requests payments received from Narrow Way Realty by Nick or any entity he owns/operates/controls. The response appears to only relate to amounts received by Nick, not about amounts received by any entity he owns/operates/controls.
- **No. 16:** The Interrogatory requests payments received from Vic or Don by Nick or any entity Nick owns/operates/controls. The response appears to only relate to amounts received by Nick, not about amounts received by any entity Nick owns/operates/controls.

DEFICIENCIES IN REQUESTS FOR PRODUCTION

Narrow Way Realty Ltd.

- **No. 1-2:** States Vic is the sole owner of Narrow Way Realty and does not indicate whether they will produce documents.
- **No. 3; 6-11; 16-47; 49; 53-54:** No basis to withhold the requested documents.
- **No. 4-5:** Not clear whether Defendant will produce the requested documents. Irrelevant that Defendant is not in the nursery or landscaping supply business.

Don Caroleo

- **No. 3; 17-22; 37-38; 42-49; 51; 54-56:** It is not clear exactly what documents are being produced in response. Defendant states, "subject to and without waiving the general and specific objections, and to the extent responsive, see production."

- **No. 4-9; 11-16; 23-28; 39-41; 50:** Only objections, no indication about whether they intend to produce responsive documents.
- **No. 29-36:** Improperly narrows the scope of the request:
 - **No. 29:** “construing the request to concern customers of Defendant in a landscape supply business, none.”
 - **No. 30:** “construing the request to concern vendors of Defendant in a landscape supply business, none.”
 - **No. 31:** “construing the request to concern employees of Defendant in a landscape supply business, none.”
 - **No. 32:** “construing the request to concern independent contractors of Defendant in a landscape supply business, none.”
 - **No. 33:** “construing the request to concern a current customer list pertaining to the landscape supply business, none.”
 - **No. 35:** “construing the request to concern employees of Defendant in a landscape supply business, none.”
 - **No. 36:** “construing the request to concern independent contractors of Defendant in a landscape supply business, none.”

3670 Route 112 LLC; 9 4th St. LLC; The Garden Dept. Corp.

- **No. 1-4; 6-7; 21; 48-54; 56-58:** It is not clear exactly what documents are being produced in response. Defendant states, “subject to and without waiving the general and specific objections, and to the extent responsive, see production.”
- **No. 5; 8-20; 22-39:** Only objections, no indication about whether they intend to produce responsive documents.
- **No. 40-44, 46-47:** Improperly narrows the scope of the request.
 - **No. 40:** “construing the request to concern customers of Defendant in a landscape supply business, none.”
 - **No. 41:** “construing the request to concern vendors used by Defendant in a landscape supply business, none.”
 - **No. 42:** “construing the request to concern employees of Defendant in a landscape supply business, none.”
 - **No. 43:** “construing the request to concern independent contractors of Defendant in a landscape supply business, none.”
 - **No. 44:** “construing the request to concern a current customer list pertaining to the landscape supply business, none.”
 - **No. 46:** “construing the request to concern employees of Defendant in a landscape supply business, none.”
 - **No. 47:** “construing the request to concern independent contractors of Defendant in a landscape supply business, none.”

Narrow Way 2 LLC

- **No. 1-2:** States Vic is the sole owner of Narrow Way 2 and does not indicate whether they will produce documents.
- **No. 3; 6-11; 16-47; 49; 53-54:** No basis to withhold the requested documents.

- **No. 4-5:** Not clear whether Defendant will produce the requested documents. Irrelevant that Defendant is not in the nursery or landscaping supply business.

Neway Management

- **No. 1-2:** States Vic is the sole owner of Neway Management and does not indicate whether they will produce documents.
- **No. 3; 5-11; 16-47; 49; 53-54:** No basis to withhold the requested documents.
- **No. 4:** Not clear whether Defendant will produce the requested documents. Irrelevant that Defendant is not in the nursery or landscaping supply business.

Group 5 Associates, Ltd.

- **No. 1-2:** States Vic is the sole owner of Group 5 and does not indicate whether they will produce documents.
- **No. 3; 5-11; 16-47; 49; 53-54:** No basis to withhold the requested documents.
- **No. 4:** Not clear whether Defendant will produce the requested documents. Irrelevant that Defendant is not in the nursery or landscaping supply business.

Scapes Supply, LLC

- **No. 1-2:** States Vic is the sole member of Scapes Supply and Nick is a former member and does not indicate whether they will produce documents.
- **No. 3; 6-11; 16-39; 42-43; 46-47; 49; 53-54:** No basis to withhold the requested documents.
- **No. 4-5:** Not clear whether Defendant will produce the requested documents. Irrelevant that Defendant is not in the nursery or landscaping supply business.

Vic Caroleo

- **No. 1:** Does not indicate whether they will produce documents.
- **No. 2-3; 6; 9-28; 31-33; 35-36; 38; 41-45; 47-52:** No basis to withhold the requested documents.
- **No. 4-5:** Directs Plaintiff to documents produced by American Community Bank. Does not indicate whether Defendant will produce responsive documents.

Nick Giordano

- **No. 1-2:** States Defendant is “not currently an owner of any defendant entities” and does not indicate whether they will produce responsive documents.
- **No. 3-6; 9-28; 31-33; 35-36; 38; 40-45; 47-52:** No basis to withhold the requested documents.